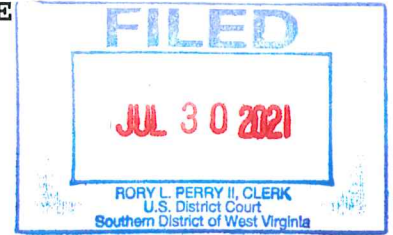


UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON GRAND JURY 2020
JULY 28, 2021 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 5:21-cr-00096

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

18 U.S.C. § 2422(b)

THOMAS JOHN MILLS

S U P E R S E D I N G
I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

(Production of Child Pornography)

From on or about March 10, 2020, through in or about October 2020, at or near Beckley, Raleigh County, West Virginia, and within the Southern District of West Virginia, defendant THOMAS JOHN MILLS did employ, use, persuade, induce, entice, and coerce a minor, Minor Female 1, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, and the visual depictions were transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO
(Enticement of a Minor)


From on or about March 10, 2020, through in or about October 2020, at or near Beckley, Raleigh County, West Virginia, and within the Southern District of West Virginia, defendant THOMAS JOHN MILLS, using a facility and means of interstate commerce, that is, a cell phone and the Internet, did knowingly persuade, induce, entice, and coerce an individual, who had not attained the age of 18 years, to engage in sexual activity for which any person could have been charged with a criminal offense.

In violation of Title 18, United States Code, Section 2422(b).

FORFEITURE

In accordance with 18 U.S.C. §§ 981(a)(1)(C), 2428 and 2253(a), 28 U.S.C. § 2461, and Rule 32.2(a) of the Federal Rules of Criminal Procedure, and premised on the conviction of defendant THOMAS JOHN MILLS of a violation of 18 U.S.C. §§ 2251 et seq. or 18 U.S.C. §§ 2421 et seq., as set forth in this superseding indictment, the defendant shall forfeit to the United States any visual depictions and any books, magazines, periodicals, films, videotapes, and other matter which contains such visual depictions, which were produced, transported, mailed, shipped, or received in connection with the violations set forth in this superseding indictment, any real and personal property constituting or traceable to gross profits or other proceeds obtained from the violations set forth in this superseding indictment, and any real and personal property used or intended to be used to commit or to promote the commission of the violations set forth in this superseding indictment.

LISA G. JOHNSTON
Acting United States Attorney

By: 
JENNIFER RADA HERRALD
Assistant United States Attorney